

Annex B

**ADDENDUM TO SECOND AMENDED AND RESTATED
AGREEMENT OF THE AD HOC GROUP
OF LEHMAN BROTHERS CREDITORS**

WHEREAS, certain funds and accounts managed by Paulson & Co. Inc. ("Paulson"), certain funds and accounts managed by Canyon Capital Advisors LLC ("Canyon"), certain funds and accounts managed by Fir Tree, Inc. (the "Fir Tree"), and certain funds and accounts managed by Taconic Capital Advisors L.P. ("Taconic") are, among other parties, parties to that certain Agreement of the Ad Hoc Group of Lehman Brothers Creditors, as amended and restated by that certain Amended and Restated Agreement of the Ad Hoc Group of Lehman Brothers Creditors and as further amended and restated by that certain Second Amended and Restated Agreement of the Ad Hoc Group of Lehman Brothers Creditors (the "Agreement"), whereby Paulson, Canyon, Fir Tree, Taconic and other parties have agreed to form an informal group (the "Ad Hoc Group of Lehman Brothers Creditors" or the "Group");

WHEREAS, the Steering Committee of the Group, as provided for in Section 3.1 of the Formation Agreement, consisted of Paulson and King Street Capital Management, L.P. ("King Street") until King Street withdrew from the Group on or around November 2010, at which point Paulson became the sole Steering Committee Participant of the Group; and

WHEREAS, pursuant to Section 3.2 of the Agreement, Paulson subsequently voted to expand the Steering Committee to make each of Canyon, Fir Tree and Taconic Steering Committee Participants and now wishes to memorialize such action in writing.

NOW, THEREFORE, Paulson agrees and Canyon, Fir Tree and Taconic hereby acknowledge that, notwithstanding anything to the contrary in the Agreement, Canyon, Fir Tree and Taconic constitute Steering Committee Participants under the Agreement.

(Paulson, Canyon, Fir Tree and Taconic shall deliver counterpart signature pages to follow.)

DATED this ____ day of April, 2011

PAULSON & CO. INC.
(on behalf of certain funds and accounts managed by it)

By: _____
Name:
Title:

CANYON CAPITAL ADVISORS LLC
(on behalf of certain funds and accounts managed by it)

By: _____
Name:
Title:

FIR TREE, INC.
(on behalf of certain funds and accounts managed by it)

By: _____
Name:
Title:

TACONIC CAPITAL ADVISORS L.P.
(on behalf of certain funds and accounts managed by it)

By: _____
Name:
Title:

SIGNATURE PAGE TO ADDENDUM TO SECOND AMENDED AND RESTATED
FORMATION AGREEMENT OF AD HOC GROUP OF LEHMAN BROTHERS CREDITORS